

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

STEPHANIE LEINER, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

JOHNSON & JOHNSON CONSUMER  
COMPANIES, INC.,

Defendant.

Case No.: 15-CV-5876

Hon. Elaine E. Bucklo

**PLAINTIFF'S UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF SETTLEMENT**

Plaintiff Stephanie Leiner (“Plaintiff”), individually and on behalf of herself and all others similarly situated, moves this Court for preliminary approval of the proposed Settlement and Class notice. As is more fully set forth in the Memorandum of Law filed herewith, Plaintiff states as follows:

1. The proposed Settlement meets the standards for preliminary approval;
2. The factors considered in the Seventh Circuit when determining final approval also support preliminary approval of the proposed Settlement;
3. The proposed notice program is appropriate; and
4. Defendants do not oppose the relief sought herein.<sup>1</sup>

WHEREFORE, Plaintiff respectfully requests that the Court grant preliminary approval and enter the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice dated August 18, 2016, (*see* Dkt. No. 75-1, Ex. 1 to Ex. A of Declaration of James C. Shah, filed August 18, 2016) and submitted in accordance with this Court’s case management procedures.

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<sup>1</sup> However, Defendants deny any wrongdoing or liability and the Settlement is not an admission of wrongdoing or liability by the Defendants.

Dated: August 18, 2016

**POMERANTZ LLP**

/s/ Jayne A. Goldstein

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